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10 Attorneys for Plaintiffs
11 TC Rich, LLC, Rifle Freight, Inc., Fleischer Customs Brokers, Richard G.
12 Fleischer, and Jacqueline Fleischer

13
14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 TC RICH, LLC, a California Limited
17 Liability Company, RIFLE FREIGHT,
18 INC., a California corporation,
19 FLEISCHER CUSTOMS BROKERS, a
20 sole proprietorship, RICHARD G.
21 FLEISCHER, an individual, and
22 JACQUELINE FLEISCHER, an
23 individual,

24 Plaintiffs,

25 v.

26 PACIFICA CHEMICAL,
27 INCORPORATED, a California
28 Corporation, AQUA SCIENCE
 ENGINEERS, INC., a California
 Corporation, A/E WEST
 CONSULTANTS, INC., a Nevada
 Corporation, and DOES 1 through 10,
 inclusive,

29 Defendants.

30 Case No. CV 15-4878 DMG (AGRx)

31 *Assigned to the Hon. Dolly M. Gee*

32 **PLAINTIFFS' NOTICE OF
33 MOTION AND MOTION FOR (1)
34 MODIFICATION OF
35 SCHEDULING ORDER AND (2)
36 LEAVE TO FILE FIRST
37 AMENDED COMPLAINT**

38 Hearing Date: April 19, 2019

39 Time: 9:30 a.m.

40 Courtroom: 8C

41 Action filed: June 26, 2015

42 Discovery cut-off: None set

43 Trial date: None set

44
45 **AND ALL RELATED CROSS-ACTIONS**

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 Notice is hereby given that on April 19, 2019, at 9:30 a.m., or as soon
3 thereafter as this Motion may be heard in Courtroom 8C of the above-entitled Court
4 located at the United States Courthouse, 350 West 1st Street, Los Angeles, CA,
5 90012, Plaintiffs TC RICH, LLC, Rifle Freight, Inc., Fleischer Customs Brokers,
6 Richard G. Fleischer, and Jacqueline Fleischer (“TC Rich,” or “Plaintiffs”) will and
7 hereby move the Court for (1) modification of its Scheduling Order to allow for TC
8 Rich to file a first amended complaint; and (2) leave to file a first amended
9 complaint under Federal Rule of Civil Procedure 16(b); *Johnson v. Mammoth*
10 *Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992).

11 This motion is made following the conference of counsel pursuant to Local
12 Rule (“L.R.”) 7-3 that took place on February 22, 2019. This Motion is based on
13 this notice; memorandum of points and authorities; declarations and exhibits
14 attached thereto; and any other matters that may properly be considered in
15 connection with this Motion.

16
17 Dated: March 21, 2019

RAINES FELDMAN LLP

18
19 By: 

JOHN S. CHA

20 Attorneys for Plaintiffs TC Rich, LLC, Rifle
21 Freight Inc., Fleischer Custom Brokers,
22 Richard G. Fleischer, and Jacqueline Fleischer